

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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April 11, 2003

Barbara Anne Sousa, Esq.
Verizon Massachusetts
Room 1403
185 Franklin Street
Boston, MA 02110

Re: D.T.E. 03-29
D.T.E.'s Second Set of Information Requests to Verizon Massachusetts

Dear Ms. Sousa:

Enclosed please find the second set of questions to Verizon issued by the Department in the above-captioned matter. Please submit Verizon's responses to the Department and the parties in hard copy and by email on or before 5:00 p.m., Tuesday, April 22, 2003. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

/s/
Paula Foley,
Hearing Officer

Encs.
cc: DTE 03-29 service list (w/encs.)

INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon Massachusetts the following Information Requests.

Instructions

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the response on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; and submit two (2) copies of the response to Paula Foley, Hearing Officer.

QUESTIONS TO VERIZON MASSACHUSETTS

D.T.E. 03-29

April 11, 2003

1. Please explain why Verizon requires renewal or replacement applicants for collocation identification badges or access cards to provide their social security number, date and place of birth, and mother's maiden name when Verizon already has that information on file.